

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

PATRICK DOUGHTY and
RANDY SEVERANCE,

Plaintiffs,

V.

STATE EMPLOYEES' ASSOCIATION
OF NEW HAMPSHIRE, SEIU LOCAL 1984,
CTW, CLC,

Defendant.

No. 1:19-cv-53-PB

DEFENDANT'S MOTION TO DISMISS

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant State Employees' Association of New Hampshire, SEIU Local 1984 ("SEA-NH") moves to dismiss the Complaint for failure to state a claim. The grounds for this Motion are set forth in the Memorandum of Law in Support of Defendant's Motion to Dismiss, filed concurrently herewith.

Respectfully submitted,

Dated: March 18, 2019

/s/ Ramya Ravindran

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CERTIFICATE OF SERVICE

I, Ramya Ravindran, an attorney, hereby certify that on March 18, 2019, I caused the foregoing **Defendant's Motion to Dismiss** to be filed electronically with the Court. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Ramya Ravindran
Ramya Ravindran